



State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

Winnepesaukee River Basin Program

Wastewater Treatment Plant

P.O. Box 68 • Franklin, NH • 03235

603-934-4032

FAX 603-934-4831



February 20, 2002

Mr. Edgar J. Babineau
Manufacturing Engineer
Lewis & Saunders, Inc.
93 Lexington Drive
P.O. Box 678
Laconia, New Hampshire 03247-0678

Subject: IDP0001: Lewis & Saunders, Inc., Laconia, N.H.;
Letter of Deficiency (WD/WRBP No. LOD 02-02) Response

Dear Mr Babineau:

On February 20, 2002, personnel from the Winnepesaukee River Basin Program (WRBP), Water Division ("the Division") conducted a review of the file of Lewis & Saunders, Inc. (L&S) for the facility located at 93 Lexington Drive in Laconia, N.H. The purpose of the review was to determine compliance with Industrial Discharge Permit (IDP) #0001 and 40 CFR 403 and applicable requirements thereto. It was noted, (Ref: your letter of February 13, 2002), that the deficiency stated in our letter dated February 4, 2002 has been addressed.

I wish to remind you that a continuous "Chain of Custody" must be maintained. If the samples are left at the receptionist's desk, then that person becomes part of the chain of custody as well as any relief receptionist.

The procedure you propose appears to be cumbersome when taking into account the "Chain of Custody" requirements. As a suggestion only, a more efficient method to assure that samples are properly handled may be to establish a "check off/sign off" document that would set down the procedures for handling the samples. This document could then be incorporated into your industrial pretreatment log to remind the operator that samples are being processed.

- CONCORD OFFICE -

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095

603-271-3504

TDD Access: Relay NH 1-800-735-2964

Mr. Edgar J. Babineau
February 20, 2002
Page 2

Thank you for your cooperation in this matter. If you have any questions regarding this letter or would like assistance in establishing a sample-handling protocol, please contact Vernon Chris Hipkiss at 934-2809

Very truly yours


COPY

Randolph Monti, Administrator
Winnepesaukee River Basin Bureau

Cc: Steven Dolloff, Superintendent, WRBP
Vernon Chris Hipkiss, Ind. Pretreatment Coord., WRBP
✓Gretchen C. Rule, DES Legal Unit w/c IDP Ltr 2/13/02
Frank Tilton, Dir. of Public Works, City of Laconia
City Clerk, City of Laconia
WRBP File

2/13/2002

Randolph Monti, Administrator
Winnepesaukee River Basin Bureau
Water Division
6 Hazen Drive, P.O. Box 95
Concord, N.H. 03301

RECEIVED
FEB 20 2002
WRBP
PRETREATMENT

Subject: IDP0001; Lewis and Saunders Inc. Laconia, N.H.

Mr. Randolph Monti,

As I stated in the phone call and written report that was sent in; the sample had been taken at the proper time however it remained in the maintenance dept. instead of being shipped out. To start with the cooler that the samples are kept in was put in the refrigerator, they are shipped back with ice packs but putting them in the refrigerator seemed to be a good idea. The root cause for this occurrence would be one of two situations. First the courier for the lab that we use may not have shown up on that day and the sample may have been forgotten about. Or second the person in the maintenance dept. that was to bring the sample up when the courier arrived had been called away on an emergency in some part of the building, which happens frequently. The container was thought to be shipped out then was forgotten about. The container, a small cooler, got mixed in with others that we keep there for future sampling and did not get noticed until the report was being filled out for the end of the quarter. To prevent a reoccurrence of this a method for the delivery of the sample to the courier will be as follows; the lab will be contacted by the person doing the sampling a day in advance to request a pick-up, the sample shall be done using the same method as always. Once taken the sample shall be brought up to the receptionist's desk to wait for pick-up it will be noted on my as well as the samplers Microsoft Outlook calendar that the sample is to be checked on by the end of the day that it has been picked up and also to be put onto the calendar will be to call the testing lab after 10 business days if the report has not been received by that time.

Additionally, being in plain of the receptionist, it will be very evident if the container is not picked up by the courier as planned.

Edgar J. Babineau
COPY

Edgar J. Babineau
Manufacturing Engineer
Lewis and Saunders Inc.
ebabineau@lewisandsaunders.com
603-524-2064 ex 217

A Smiths Aerospace Tubular Systems Company

Mr. Randolph Monti
February 13, 2002
Page 2

RECEIVED
FEB 20 2002
WRBP
PRETREATMENT

Certified Mail: Vernon Chris Hipkiss, IPP Coordinator
Winnepesaukee River Basin Program
Franklin Wastewater Treatment plant
-River Street, P.O. Box 68
Franklin, N.H. 03235

cc: David Bonisteel	General Manager
Harland Blanchard	Technical Director
Mike Sandahl	Plant Manager
File	



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Wastewater Treatment Plant

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LETTER OF DEFICIENCY - File Review
WD/WRBP No. LOD 02-02



February 4, 2002

Mr. Edgar J. Babineau
Manufacturing Engineer
Lewis & Saunders, Inc.
93 Lexington Drive
P.O. Box 678
Laconia, New Hampshire 03247-0678

CERTIFIED MAIL
7099 3400 0009 7944 3327

Subject: IDP0001: Lewis & Saunders, Inc., Laconia, N.H.;
File Review

Dear Mr Babineau:

On January 30, 2002, personnel from the Winnepesaukee River Basin Program (WRBP), Water Division ("the Division") conducted a review of the file of Lewis & Saunders, Inc. (L&S) for the facility located at 93 Lexington Drive in Laconia, N.H. The purpose of the review was to determine compliance with Industrial Discharge Permit (IDP) #0001 and 40 CFR 403 and applicable requirements thereto. During the review the following deficiency was noted:

- (1) L&S sampled on November 16, 2001 for all parameters required by its IDP in the fourth quarter 2001 monitoring period (October 1, 2001 through December 31, 2001), however the samples did not reach the company's designated certified lab for analysis until January 23, 2002. This delay resulted in expired holding times for cyanide and oil and grease. Although L&S is analyzing the cyanide and oil and grease samples for reference information, results for these two parameters are invalid.

The Division believes that the cited deficiency can be prevented from reoccurring. Within 10 business days of receipt of this letter submit a report describing what corrective measures you have taken and what controls you plan to institute to avoid future deficiencies of the same nature. WRBP personnel will continue to conduct regular follow-up reviews to ensure that you are maintaining full compliance with IDP #0001.

- CONCORD OFFICE -

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095
603-271-3504

TDD Access: Relay NH 1-800-735-2964

Mr. Edgar J. Babineau
February 4, 2002
Page 2

The written report identifying the corrective measures taken shall be addressed as follows

Randolph Monti, Administrator
Winnepesaukee River Basin Bureau
Water Division
6 Hazen Drive, P.O. Box 95
Concord, N.H. 03301

Please forward a copy of the written report to the WRBP office addressed as follows:

Vernon Chris Hipkiss, IPP Coordinator
Winnepesaukee River Basin Program
Franklin Wastewater Treatment Plant
River Street, P.O. 68
Franklin, N.H. 03235

Should you have any questions regarding this letter please contact Vernon Chris Hipkiss at 934-2809.

Very truly yours,

COPY

Randolph Monti, Administrator
Winnepesaukee River Basin Bureau

CERTIFIED MAIL

Cc: Steven Dolloff, Superintendent, WRBP
Vernon Chris Hipkiss, Ind. Pretreatment Coord., WRBP
Gretchen C. Rule, Enforcement Coord., DES
Frank Tilton, Dir. of Public Works, City of Laconia
City Clerk, City of Laconia
WRBP File